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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUDE JOHNSON,

Plaintiff,

vs.

PAM SPECIALTY HOSPITAL OF LAS VEGAS
LLC, a Pennsylvania Limited Liability Company;
Does I-X; Roe Corporations I-X,
Defendants

CASE NO.: 2:24-cv-00086-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER
DEADLINES
(FIRST REQUEST)**

The parties by and through their undersigned counsel of record stipulate to extend the Discovery Plan and Scheduling Order deadlines in this case for an additional sixty (60) days per the schedule set forth below. This Stipulation is being entered in good faith and not for the purpose of delay.

I. STATUS OF DISCOVERY

A. PLAINTIFF'S DISCOVERY

1. Plaintiff's Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1) dated March 25, 2024.

2. Plaintiff's First Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1) dated April 18, 2024.

3. Plaintiff's Second Supplemental Disclosure of Witnesses and Documents Pursuant to FRCP 26(a)(1) dated June 5, 2024.

1 4. Plaintiff's Answers to Defendant's First Set of Interrogatories dated May 21,
2 2024.

3 5. Plaintiff's Answers to Defendant's First Set of Requests for Production of
4 Documents dated May 21, 2024.

5 6. Plaintiff's Requests for Documents to Defendant dated June 10, 2024.

6 7. Plaintiff's Interrogatories to Defendant dated June 10, 2024.

7 **B. DEFENDANTS' DISCOVERY**

8 1. Defendant's Initial Disclosure of Witnesses and Documents Pursuant to FRCP
9 26(a)(1) dated March 25, 2024.

10 2. Defendant's First Supplemental Disclosure of Witnesses and Documents
11 Pursuant to FRCP 26(a)(1) dated April 2, 2024.

12 3. Defendant served a subpoena duces tecum on the Nevada Equal Rights
13 Commission on April 16, 2024.

14 4. Defendant served a subpoena duces tecum on Encompass Health Corporation
15 on May 3, 2024.

16 5. Defendant served a subpoena duces tecum on the Nevada Department of
17 Employment, Training, and Rehabilitation on May 3, 2024.

18 6. Defendant's First Set of Interrogatories to Plaintiff dated April 10, 2024.

19 7. Defendant's First Set of Requests for Production of Documents to Plaintiff
20 dated April 10, 2024.

21 **C. DEPOSITIONS**

22 1. Defendant has noticed Plaintiff's deposition for July 23, 2024.

23 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

24
25 The Parties need to schedule depositions of percipient witnesses and Plaintiff will take
26 the deposition of the Defendant, pursuant to FRCP Rule 30(b)(6). Depending on what is
27 discovered in depositions, the parties may potentially propound additional written discovery or
28

amend current written discovery responses. For the reasons explained below, the Parties will need additional time to propound written discovery, respond to written discovery, and conduct depositions.

III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY

Pursuant to Local Rule 26-3, the Parties acknowledge that a stipulation to extend a deadline set forth in a discovery plan must be submitted to the Court no later than 21 days before the expiration of the subject deadline, and that a request made within 21 days must be supported by a showing of good cause. This request is being submitted prior to 21 days before the current discovery cutoff date of July 15, 2024.

The Parties are proceeding in discovery, but certain factors including Plaintiff's counsel's own health concerns that caused a one week hospital stay in April 2024, and his associate's (also his sister) ongoing serious health conditions which have repeatedly put her in the hospital, has impacted Plaintiff's counsel's time and discovery in this and other cases, and has slowed or delayed discovery in this case as a consequence.

The Parties respectfully request an extension of time to extend the discovery in this matter to enable to them to conduct necessary discovery in this matter and so that this matter is fairly resolved on the merits. As the procedural history of this case illustrates, the Parties have been diligent in litigating this matter under the circumstances. The Parties intend to promptly engage in written discovery and to schedule the remaining depositions.

IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DEADLINES

	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	Expired	Expired
Initial Expert Disclosures	Expired	Expired
Rebuttal Expert Disclosures	June 15, 2024	Expired
Discovery Cut-Off	July 15, 2024	September 13, 2024
Dispositive Motions	August 14, 2024	October 14, 2024 (Oct

		13 is a Sunday)
Pretrial Order	September 13, 2024	November 12, 2024 (If dispositive motions are filed, the deadline shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

Based on the foregoing stipulation and proposed deadlines, the Parties respectfully request that the Discovery Plan and Scheduling Order deadlines be extended an additional SIXTY (60) days so the Parties may conduct their remaining written discovery and depositions.

DATED June 10, 2024.

KEMP & KEMP, ATTORNEYS AT LAW

LITTLER MENDELSON, P.C.

By: /s/ James P. Kemp

By: /s/ Andrew S. Clark

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ORDER

The above Stipulation is hereby granted.

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 12, 2024